

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

POLYSCIENCES, INC.,

Plaintiff,

v.

JOSEPH T. MASRUD,

Defendant.

Case No. 20-cv-03649-PBT

**PLAINTIFF POLYSCIENCES, INC.'S MOTION FOR A TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY INJUNCTION**

Plaintiff Polysciences, Inc. (“Polysciences”) respectfully moves this Court under Fed. R. Civ. P. 65 for entry of a temporary restraining order and preliminary injunction enjoining the misappropriation by former Polysciences employee, Defendant Joseph T. Masrud (“Mr. Masrud”), of Polysciences trade secrets and Mr. Masrud’s breach of his confidentiality agreement.

As indicated in the accompanying Memorandum of Law and the Verified Complaint filed with the Court, Mr. Masrud has misappropriated Polysciences trade secrets related to the development, production, and sale of high-quality Polyethylenimine (“PEI”) transfection reagents used for the research, development and commercial supply of biological treatments for humans. His actions violate the Pennsylvania Uniform Trade Secrets Act and the Defend Trade Secrets Act, and also breach his confidentiality agreement, and should be enjoined to prevent irreparable harm to Polysciences for which Polysciences has no adequate remedy at law.

**WHEREFORE**, Polysciences respectfully requests that the Court enter the accompanying proposed order for a temporary restraining order and/or preliminary injunction enjoining Mr. Masrud's misappropriation of trade secrets and breach of his confidentiality agreement, and schedule the matter for expedited discovery and a preliminary injunction hearing.

Respectfully submitted,

Date: July 28, 2020

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